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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14
15 INTERNATIONAL MARKETS LIVE INC.,
a New York corporation dba IM MASTERY
16 ACADEMY,

17 Plaintiff,

18 v.

19 DAVID IMONITIE an individual; SPELA
SLUGA, an individual; DEVON ROESER, an
20 individual; IVAN TAPIA, an individual;
NVISIONU, INC., a Delaware corporation;
21 ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
22 individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
23 IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
24 CAVALLERI, an individual; JOSE MIGUEL
CONTREAS, an individual; BASS GRANT,
25 an individual; ANGELA CRUISHANK, an
individual; JEFF CRUISHANK, an
26 individual; VINCE MURPHY, an individual;
GARY MCSWEEN, an individual;
27 KATRINA WORGESS, an individual; LUIS
RONALDO HARNANDEZ ARRIAGA, an
28 individual; STEPHANIA AYO, an individual;

Case No.: 2:22-cv-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO MOTIONS TO DISMISS
(ECF Nos. 87, 88, 89) (FIRST REQUEST)**

SILVIA AYO, an individual; CATALINA VASQUEZ, an individual; MATHIAS VASQUEZ, an individual; DOES 1 through 10, inclusive; and ROE CORPORATIONS I through X, inclusive,

Defendants.

AND ALL RELATED MATTERS.

Plaintiff/Counterdefendant INTERNATIONAL MARKETS LIVE INC., dba IM MASTERY ACADEMY (“IML” or “Plaintiff”) and Defendants DAVID IMONITIE, SPELA SLUGA, DEVON ROESER, IVAN TAPIA, NVISIONU, INC., ILYKIT, LLC, LUCAS LONGMIRE, and BASS GRANT (“Defendants” and collectively, with IML, as the “Parties”), by and through their respective undersigned counsel of record, hereby stipulate and agree to a seven (7)-day extension of the current February 6, 2023 deadline for IML to file responses to Defendants Grant’s and Longmire’s Motion to Dismiss for Failure to State a Claim (ECF No. 87), Defendant Longmire’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 88), and Defendant Grant’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 89), dated Jan. 23, 2023, which is the first requested extension, as follows:

1. On January 23, 2023, Defendants Grant’s and Longmire’s Motion to Dismiss for Failure to State a Claim (ECF No. 87), Defendant Longmire’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 88), and Defendant Grant’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 89) (collectively, as “Motions to Dismiss”).

2. Responses to the Motions to Dismiss are currently due by February 6, 2023.

3. The Parties stipulate and agree to extend the current February 6, 2023 deadline for responses to the Motions to Dismiss by seven (7) days to **February 13, 2023**.

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4. This Stipulation is made in good faith, not for purposes of undue delay, and supported by good cause.

IT IS SO STIPULATED.

DATED this 31st day of January 2023.

HOLLAND & HART LLP

/s/ Lars K. Evensen

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Attorney for Defendant Ivan Tapia

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 31, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO MOTIONS TO DISMISS (ECF Nos. 87, 88, 89) (FIRST REQUEST)** was served by the following method(s):

- ☒ Electronic: by submitting electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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